

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

Planned Parenthood Federation of America,
Inc., Planned Parenthood Gulf Coast, Inc.,
Planned Parenthood of Greater Texas, Inc.,
Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County, Inc.,
Planned Parenthood San Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-00022-Z

DECLARATION OF POLIN BARRAZA

I, Polin Barraza, declare and state as follows:

1. I am currently employed by Planned Parenthood South Texas, Inc. (“PPST”) as Senior Vice President and Chief Operating Officer. I have been the Chief Operating Officer since 2013. From 2010 to 2012, I was Senior Vice President-Healthcare & Compliance. I also currently volunteer at PPST subsidiaries Planned Parenthood San Antonio, Inc. (“PPSA”) as President and Board Chair, a position I have held since 2019, and Planned Parenthood Cameron County, Inc. (“PPCC”) as President, a position I have served in since 2020. I refer to PPST, PPSA, and PPCC collectively as “PPST” in this declaration. I am over the age of 18 and have personal knowledge of the matters herein or have acquired such knowledge by personally examining business records

kept in the ordinary course of PPST's business. If called upon to testify, I could and would testify thereto.

2. I make this declaration in support of Defendants' Opposition to Relator's Motion to Unseal Plaintiffs' Reply in Support of Plaintiffs' Motions for Summary Judgment and Second Supplemental Appendix (ECF No. 459). I understand that the Relator is attempting to unseal Plaintiffs' Reply (ECF No. 495) and 1,569 page Second Supplemental Appendix (ECF No. 496), and that some of the documents in Plaintiffs' Second Supplemental Appendix were designated by PPST as "Confidential" or "Confidential Attorneys' Eyes Only" under the Protective Order entered in this matter. I also understand that Plaintiffs included certain documents designated by PPST as "Confidential" or "Confidential Attorneys' Eyes Only" in their Appendix in Support of their Motions for Summary Judgment (ECF No. 475) ("Appendix") cited certain designated documents in their Appendix for the first time in their Reply. PPST has reviewed the documents in Plaintiffs' Appendix and Second Supplemental Appendix and has downgraded the confidentiality designations on certain documents. Unsealing the documents or portions of documents that PPST has not downgraded would substantially and materially harm PPST and others by disclosing trade-secret level, non-public information.

3. PPST is a healthcare provider, and competes with other healthcare organizations for medical professionals and patients in the market place. As a 501(c)(3) non-profit organization, PPST is also reliant on securing donations and other grants to fund its mission of providing high-quality reproductive healthcare to its patients in Texas. In that context, PPST is competing with similarly situated organizations to secure access to donations and grants. In addition, PPST's mission elicits strong opposition actors who have conducted acts against PPST that range from harassing business and mission partners to acts of violence.

4. The documents Relator is seeking to unseal were designated as “Confidential” or “Confidential Attorneys’ Eyes Only Information” because they include the contact information of non-parties, non-party financial information, trade secret and proprietary information, and financial and grant information.

Documents in Plaintiffs’ Appendix that were Cited for the First Time in the Reply

5. PPST stated its objections on grounds other than the lack of citation to unsealing the documents in Plaintiffs’ Appendix that were designated by PPST as “Confidential” or “Confidential Attorneys’ Eyes Only,” in its February 8, 2023 Declaration. *See* Barraza Dec. ¶¶ 5, 7-8, ECF No. 488 at 30-32.¹ PPST reincorporates these objections now that the documents have been cited.

Documents in Plaintiffs’ Second Supplemental Appendix

6. Non-Party Names and Contact Information. The document in this category includes the personal cellphone number of a retired PPST employee. APPX.009228–9229. Disclosure of this information into the public record may expose this former employee to targeted harassment and the risk of personal harm.

¹ PPST objected to the unsealing of: (1) APPX.004222-4385 because it contain non-party financial information; (2) APPX.005289-5303 because it contained trade secret and proprietary information; and (3) APPX.004127-APPX.004130 and APPX.005128-5129 because they contain financial and grant information.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on July 10, 2023 in San Antonio, Texas.

Polin Barraza

Polin Barraza (Jul 10, 2023 14:05 CDT)

Polin Barraza